## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Marco M. Santini Dorothy P. Santini **BK NO. 18-17067 AMC** 

Debtor(s)

Chapter 13

PennyMac Loan Services, LLC

VS.

Movant

Marco M. Santini Dorothy P. Santini

Debtor(s)

William C. Miller Esq.

**Trustee** 

## PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Creditor PennyMac Loan Services, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage 04/01/2020 through 06/30/2020. Creditor holds a secured interest in real property commonly known as 4003 Garrett Road Drexel Hill, PA 19026 as evidenced by claim number 12 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Case 18-17067-amc Doc 32 Filed 05/29/20 Entered 05/29/20 09:11:44 Desc Main Document Page 2 of 2

Per the request, Debtor will resume Mortgage payments beginning <u>07/01/2020</u> and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves it rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/<u>Rebecca A. Solarz Esquire</u> Rebecca A. Solarz Esquire Attorney for Creditor